

**THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Theresa Ann Brinson aka Theresa A. Brinson	:	CHAPTER 7
aka Theresa Brinson	:	
<u>Debtor</u>	:	No. 18-02948 JJT
	:	
PACIFIC UNION FINANCIAL	:	
<u>Moving Party</u>	:	
	:	
	:	
IN RE: Theresa Ann Brinson aka Theresa A. Brinson	:	
aka Theresa Brinson	:	11 U.S.C, Section 362
<u>Debtor</u>	:	
	:	
Robert P. Sheils, Jr., Trustee	:	
<u>Trustee</u>	:	

ANSWER TO MOTION FOR RELIEF OF FPACIFIC UNION FINANCIAL

NOW COMES Trustee, Robert P. Sheils, Jr., Esquire, by and through his attorneys, Sheils Law Associates, P.C., and answers the Motion of Pacific Union Financial for Automatic Stay, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph five and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors currently scheduled for August 24, 2018.

6. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph six and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors

7. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph seven and strict proof thereof is demanded.

8. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eight and strict proof thereof is demanded.

WHEREFORE, Robert P. Sheils, Jr., Esquire, Chapter 7 Trustee, respectfully requests this Honorable Court deny Movant's Motion for Relief until after the 341 meeting of creditors currently scheduled for August 24, 2018.

Dated: August 13, 2018

/s/ Jill M. Spott
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